

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2014-1-E**

<b>In the Matter of</b>	<b>)</b>	<b>DIRECT TESTIMONY OF</b>
<b>Annual Review of Base Rates</b>	<b>)</b>	<b>T. PRESTON GILLESPIE, JR. FOR</b>
<b>for Fuel Costs for</b>	<b>)</b>	<b>DUKE ENERGY PROGRESS, INC.</b>
<b>Duke Energy Progress, Inc.</b>	<b>)</b>	

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1     **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2     A.     My name is T. Preston Gillespie, Jr. and my business address is 526 South Church  
3           Street, Charlotte, North Carolina.

4     **Q.     BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5     A.     I am Senior Vice President of Nuclear Operations for Duke Energy Carolinas, LLC  
6           ("DEC"). I have executive accountability for DEC's Oconee Nuclear Station  
7           ("Oconee") in Seneca, South Carolina, and Duke Energy Progress, Inc.'s ("DEP" or  
8           the "Company") Robinson Nuclear Generating Station ("Robinson") near Hartsville,  
9           South Carolina.

10    **Q.     WHAT ARE YOUR RESPONSIBILITIES AS SENIOR VICE PRESIDENT**  
11       **OF NUCLEAR OPERATIONS FOR OCONEE AND ROBINSON?**

12    A.     As Senior Vice President of Nuclear Operations for Oconee and Robinson, I am  
13           responsible for providing executive oversight for the safe and reliable operation of  
14           those nuclear stations.

15    **Q.     PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
16       **PROFESSIONAL EXPERIENCE.**

17    A.     I have a Bachelor's degree in Mechanical Engineering from Clemson University. I  
18           am a registered professional engineer in South Carolina, and held a senior operator  
19           license from the U.S. Nuclear Regulatory Commission ("NRC"). I began my career  
20           with DEC (formerly known as Duke Power Company) in 1986 as an assistant  
21           engineer at Oconee. Since that time, I have held various roles of increasing  
22           responsibility in engineering, work management, and operations, including  
23           operations shift manager, and nuclear engineering manager in 2004 responsible for

1 managing the nuclear and electrical engineering activities at Oconee. I was named  
2 operations manager at Catawba Nuclear Station in 2007, and in 2008 I became plant  
3 manager at Oconee, transitioning to site vice president in September 2010. I  
4 assumed my current role in March 2013.

5 **Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**  
6 **PROCEEDINGS?**

7 A. Yes. I testified before the Public Service Commission of South Carolina in DEP's  
8 2013 annual fuel proceeding in Docket No. 2013-1-E.

9 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
10 **PROCEEDING?**

11 A. The purpose of my testimony is to describe and discuss the performance of  
12 Brunswick Nuclear Station ("Brunswick"), Shearon Harris Nuclear Station  
13 ("Harris"), and Robinson for the period of March 1, 2013 through February 28, 2014  
14 (the "review period").

15 **Q. YOUR TESTIMONY INCLUDES THREE EXHIBITS. WERE THESE**  
16 **EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER**  
17 **YOUR SUPERVISION?**

18 A. Yes. These exhibits were prepared at my direction and under my supervision.

19 **Q. PLEASE PROVIDE A DESCRIPTION OF THE EXHIBITS.**

20 A. The exhibits and descriptions are as follows:

21 Gillespie Exhibit 1 - Calculation of the nuclear capacity factor for the  
22 review period pursuant to § 58-27-865 of the Code of

Laws of South Carolina ("S.C. Code Ann." or the "Code")

**Gillespie Exhibit 2- Nuclear outage data for the review period**

**Gillespie Exhibit 3 - Nuclear outage data for the billing period<sup>1</sup>**

**Q. PLEASE DESCRIBE DEP'S NUCLEAR GENERATION PORTFOLIO.**

A. The Company's nuclear generation portfolio consists of approximately 3,050 megawatts ("MWs") of generating capacity, made up as follows:

**Brunswick - 1,527 MWs<sup>2</sup>**

**Harris -** 778 MWs<sup>3</sup>

**Robinson - 741 MWs**

**Q. PLEASE PROVIDE A GENERAL DESCRIPTION OF DEP'S NUCLEAR GENERATION ASSETS.**

A. The Company's nuclear fleet consists of three generating stations and a total of four units. Brunswick is a boiling water reactor facility with two units located just north of Southport, North Carolina, and was the first nuclear plant built in North Carolina. Unit 2 began commercial operation in 1975, followed by Unit 1 in 1977. The operating licenses for Brunswick were renewed in 2006 by the NRC, extending operations up to 2036 and 2034 for Units 1 and 2, respectively. Harris, located in New Hill, North Carolina, is a pressurized water reactor that began commercial operation in 1987. The NRC issued a renewed license for Harris in 2008, extending operations up to 2046. Brunswick and Harris are jointly owned with the North Carolina Eastern Municipal Power Agency. Robinson is a single unit pressurized

<sup>1</sup> This data is provided in confidential and publicly redacted versions for security purposes.

<sup>2</sup> Represents DEP's ownership share of 81.67%.

<sup>3</sup><sub>3</sub> Represents DEP's ownership share of 83.83%.



1 water reactor located near Hartsville, South Carolina that began commercial  
2 operation in 1971. The license renewal for Robinson Unit 2 was issued by the NRC  
3 in 2004, extending operation for Robinson up to 2030.

4 **Q. WHAT ARE DEP'S OBJECTIVES IN THE OPERATION OF ITS**  
5 **NUCLEAR GENERATION ASSETS?**

6 A. The primary objective of DEP's nuclear generation department is to safely provide  
7 reliable and cost-effective electricity to DEP's Carolinas customers. The Company  
8 achieves this objective by focusing on a number of key areas. Operations personnel  
9 and other station employees are well-trained and execute their responsibilities to the  
10 highest standards in accordance with detailed procedures. The Company maintains  
11 station equipment and systems reliably, and ensures timely implementation of work  
12 plans and projects that enhance the performance of systems, equipment, and  
13 personnel. Station refueling and maintenance outages are conducted through the  
14 execution of well-planned, well-executed, and high quality work activities, which  
15 effectively ready the plant for operation until the next planned outage.

16 **Q. PLEASE DISCUSS THE PERFORMANCE OF DEP'S NUCLEAR FLEET**  
17 **DURING THE REVIEW PERIOD.**

18 A. Overall, DEP's nuclear stations operated well during the review period, and supplied  
19 43.7% of the power used by its Carolinas customers. The four nuclear units  
20 operated at an actual system average capacity factor of 86.77%, with Brunswick  
21 Unit I achieving an actual capacity factor of 98.3%. Robinson completed a breaker-  
22 to-breaker run of 531 days leading into the fall refueling and maintenance outage

1 that began on September 14, 2013, marking a new record and besting the previous  
2 record of 517 days, which was set in 2002.

3 The Company continues to look for ways to improve the operations of its  
4 nuclear fleet, which, as shown on Gillespie Exhibit I, achieved a net nuclear  
5 capacity factor, excluding reasonable outage time pursuant to S.C. Code Ann. § 58-  
6 27-865(F), of 102.21% for the review period. This capacity factor is above the  
7 92.5% set forth in this section of the Code, which states in pertinent part:

8 There shall be a rebuttable presumption that an electrical utility made  
9 every reasonable effort to minimize cost associated with the  
10 operation of its nuclear generation facility or system, as applicable, if  
11 the utility achieved a net capacity factor of ninety-two and one-half  
12 percent or higher during the period under review. The calculation of  
13 the net capacity factor shall exclude reasonable outage time  
14 associated with reasonable refueling, reasonable maintenance,  
15 reasonable repair, and reasonable equipment replacement outages;  
16 the reasonable reduced power generation experienced by nuclear  
17 units as they approach a refueling outage; the reasonable reduced  
18 power generation experienced by nuclear units associated with  
19 bringing a unit back to full power after an outage....  
20

21 The performance results discussed above support DEP's continued commitment for  
22 achieving high performance without compromising safety and reliability.

23 **Q. WHAT IMPACTS A UNIT'S AVAILABILITY AND WHAT IS DEP'S**  
24 **PHILOSOPHY FOR SCHEDULING REFUELING AND MAINTENANCE**  
25 **OUTAGES?**

26 **A.** In general, refueling requirements, maintenance requirements, prudent maintenance  
27 practices, and NRC operating requirements impact the availability of DEP's nuclear  
28 system. Prior to a planned outage, DEP develops a detailed schedule for the outage  
29 and for major tasks to be performed including sub-schedules for particular activities.

1           The Company's scheduling philosophy is to plan for a best possible outcome  
2           for each outage activity within the outage plan. For example, if the "best ever" time  
3           an outage task was performed is 10 days, then 10 days or less becomes the goal for  
4           that task in each subsequent outage. Those individual goals are incorporated into an  
5           overall outage schedule. The Company aggressively works to meet, and measures  
6           itself against, that schedule. Further, to minimize potential impacts to outage  
7           schedules, "discovery activities" (walk-downs, inspections, etc.) are scheduled at the  
8           earliest opportunities so that any maintenance or repairs identified through those  
9           activities can be promptly incorporated into the outage plan.

10           As noted, the schedule is utilized for measuring outage planning and  
11           execution, and driving continuous improvement efforts. However, in order to  
12           provide reasonable, rather than best ever, total outage time for planning purposes,  
13           particularly with the dispatch and system operating center functions, DEP also  
14           develops an allocation of outage time which incorporates reasonable schedule losses.  
15           The development of each outage allocation is dependent on maintenance and repair  
16           activities included in the outage, as well as major projects to be implemented during  
17           the outage. Both schedule and allocation are set aggressively to drive continuous  
18           improvement in outage planning and execution.

19   **Q.   HOW DOES DEP HANDLE OUTAGE EXTENSIONS AND FORCED**  
20   **OUTAGES?**

21   **A.   When an outage extension becomes necessary, DEP believes that work completed in**  
22   **the extension results in longer continuous run times and fewer forced outages,**  
23   **thereby reducing fuel costs in the long run. Therefore, if an unanticipated issue that**

1 has the potential to become an on-line reliability issue is discovered while a unit is  
2 off-line for a scheduled outage and repair cannot be completed within the planned  
3 work window, the outage is usually extended to perform necessary maintenance or  
4 repairs prior to returning the unit to service. In the event that a unit is forced off-  
5 line, every effort is made to safely perform the repair and return the unit to service as  
6 quickly as possible.

7 **Q. DOES DEP PERFORM POST OUTAGE CRITIQUES AND CAUSE**  
8 **ANALYSES FOR INTERNAL IMPROVEMENT EFFORTS?**

9 **A.** Yes. The Nuclear industry recognizes that constant focus on raising standards and  
10 excellence in operations results in improved nuclear safety and reliability. As such,  
11 DEP applies self-critical analysis to each outage and, using the benefit of hindsight,  
12 identifies every potential cause of an outage delay or event resulting in a forced or  
13 extended outage, and applies lessons learned to drive continuous improvement. The  
14 Company also evaluates the performance of each function and discipline involved in  
15 outage planning and execution from the perspective of identifying areas in which it  
16 can utilize self-critical observation for improvement efforts. Given this focus on  
17 identifying opportunities for improvement, these critiques and cause analyses do not  
18 document the broader context of the outage or event, and rarely reflect DEP's  
19 strengths and successes.

20 As an example, the Brunswick Unit 2 alternate decay heat removal  
21 (~~ADHR~~) project "lessons learned" significantly benefitted a condensate margin  
22 improvement project for Brunswick Unit 1 with respect to piping and support  
23 system installation. The extensive use of metrology, prefabrication work, granular

1 resource loaded scheduling, and robust oversight not only contributed to meeting the  
2 project schedule, but also contributed to the Brunswick team's success in avoiding  
3 adverse impacts to the overall refueling and maintenance outage.

4 **Q. WHAT OUTAGES WERE REQUIRED FOR REFUELING AND**  
5 **MAINTENANCE AT DEP'S NUCLEAR FACILITIES DURING THE**  
6 **REVIEW PERIOD?**

7 **A.** There were three refueling and maintenance outages during the review period and  
8 additional time was required for two of these outages to complete activities needed  
9 for on-line reliability. The spring 2013 refueling and maintenance outage on  
10 Brunswick Unit 2 was allocated for 55 days and required a 13-day extension, most  
11 notably due to installation of the ADHR system, an upgraded replacement to the  
12 aging and obsolete vintage system, and emergent replacement of both safety-related  
13 transformers. Other major work completed during the Unit 2 outage at Brunswick  
14 included replacement of the auxiliary transformer, installation of a drywell camera  
15 for on-line leakage monitoring, guide pad repairs on the main steam isolation valves,  
16 implementation of a variable frequency drive software upgrade to improve  
17 reliability, and completion of 292 flow accelerated corrosion inspections of main  
18 steam cross-under piping, as well as a vessel internals inspection. The Company  
19 also de-sludged the Torus - which is a pool of water used to suppress or cool the  
20 reactor coolant in an accident - to reduce radiation dose and improve safety system  
21 suction strainer design margins, and modified the feedwater pump main oil pumps to  
22 improve reliability. In total, DEP completed 16,678 activities within this outage.

1           The refueling and maintenance outage for Robinson began in September  
2           2013. The outage was allocated at 55 days and was completed 2.5 days ahead of  
3           that allocation. Both primary and secondary maintenance efforts were completed for  
4           the reactor vessel, steam generators, reactor coolant pumps, and heat exchangers  
5           along with maintenance activities for the turbine/generator, main feedwater pumps,  
6           service water, and condensers. Major activities completed included inspections of  
7           the reactor vessel cold leg nozzles and injection valves, bottom mounted  
8           instrumentation, core barrel upper and lower girth weld and lower flange, primary  
9           bowl cladding, and steam generator dome and upper support plate. Replacements  
10          included the reactor coolant pump seal return isolation valve and motor, spray  
11          discharge isolations, and the residual heat removal ("RHR") pump motor and seal,  
12          along with the RHR heat exchanger outlet bonnet gasket. The Company also  
13          completed upgrades for lube oil filtration and seal oil cooler tube bundle for the  
14          turbine/generator, and a coupling design upgrade for the main feedwater pump. In  
15          total, DEP completed 12,361 refueling and maintenance activities within this outage.

16          Harris also began a refueling and maintenance outage in the fall of 2013  
17          which was allocated for 26 days and required an extension of 6 days primarily due to  
18          repairs prompted by the discovery of a penetration in a reactor head nozzle during  
19          inspection. Major work activities during this outage included replacement of the  
20          turbine driven auxiliary feedwater control panel, reactor vessel head penetration  
21          inspection, check valve inspections, replacement of a safety related cooling coil in  
22          containment fan cooler, draining and repair of containment spray additive tank  
23          welds, emergency diesel generator ("EDG") governor replacement, and replacement

1 of solid state protection system cards on the B Train. In total, DEP completed  
2 11,399 activities within this outage.

3 **Q. WHAT MEASURES HAS DEP TAKEN TO MAINTAIN THE GOOD**  
4 **PERFORMANCE OF ITS NUCLEAR FLEET?**

5 A. At Brunswick, safety and plant reliability are also a key focus with improvements  
6 associated with diesel generator reliability and switchyard reliability. Efforts include  
7 installation of a supplemental generator, EDG starting air modifications and fuel oil  
8 piping replacement, and transmission insulator replacements. Other recently  
9 completed improvements include installation of on-line noble chemistry for Unit 1,  
10 which improves radiological safety and reduces worker dose, and flooding  
11 mitigation improvements that involved implementation of "Cliff Edge"  
12 modifications installing barriers and wave deflectors to address NRC requirements  
13 stemming from the Fukushima event in 2011. Brunswick is in the final stages of  
14 completing replacement of the fire detection system in the control building, which is  
15 on schedule for completion later this year. Turbine building chiller replacement is  
16 scheduled to complete in 2015, and governor and voltage regulator replacements for  
17 the EDGs will be completed over the next few years.

18 At Harris, projects are underway to improve reliability, address end-of-life  
19 equipment, and perform upgrades required to comply with current industry  
20 standards. Recently completed upgrades include structural stiffening of the low  
21 pressure turbine supports, non-safety transformer replacements, new heater drain  
22 system control components, repair of the reactor vessel head penetrations, and new  
23 EDG governors. Ongoing major replacement projects include the "C" air

1 compressor, which is on schedule for completion in July 2014, and start-up  
2 transformer cable rerouting with cable replacement completion in June 2014 with  
3 old cable removal scheduled for completion in 2015. The Company is also  
4 upgrading the start-up transformer oil-filled cable, eliminating the underground  
5 cable, and replacing it with overhead cable to meet updated standards and address  
6 environmental concerns with age and leakage. In addition, DEP has implemented a  
7 breaker and dry type transformer breaker replacement program at Harris, along with  
8 the replacement of the fire detection system, both of which are projected to finish in  
9 2017. The 2018 projection includes replacement of the reactor vessel head based on  
10 industry recommendation and to address end-of-life.

11 At Robinson, engineering, operations, and maintenance teams have  
12 continued the momentum of making significant improvements in system and  
13 component performance. The Company's development of high intensity teams for  
14 major modification work included in the fall 2013 outage proved successful along  
15 with enhanced training and qualification program efforts. Other efforts underway  
16 include implementing upgrades to primary coolant system and steam generator  
17 make-up capability, as well as electrical modifications for backup power to support  
18 Fukushima requirements. Completion of a new on-site building for storage of  
19 reusable contaminated equipment for outages is on schedule for the end of 2014.  
20 This effort will greatly improve load-in and load-out of containment in future  
21 outages. With the projected 2015 installation of new Westinghouse shutdown  
22 reactor coolant pump seals on all three pumps, DEP is also reducing risk of core  
23 damage from a loss of seal cooling.



- 1    **Q.     DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**
- 2    **A.     Yes, it does.**

DUKE ENERGY PROGRESS  
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS  
NUCLEAR CAPACITY FACTOR PURSUANT TO S.C. CODE ANN. § 58-27-865(F)  
REVIEW PERIOD OF MARCH 2013 THROUGH FEBRUARY 2014

1	Nuclear System Actual Net Generation During Review Period	26,901,281 MWH
2	Total Number of Hours During 2013 portion of Review Period	8,760
3	Nuclear System MDC During 2013 portion of Review Period	3,539 MW
4	Reasonable Nuclear System Reductions	4,683,239 MWH
5	Nuclear System Capacity Factor $((L1/(L2a*L3a)-L4)*100$	<u>102.21</u> %

DUKE ENERGY PROGRESS  
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS  
NUCLEAR OUTAGE DATA FOR REVIEW PERIOD OF  
MARCH 2013 THROUGH FEBRUARY 2014

Nuclear Outages Lasting One Week Or More - Review Period

Station/Unit	Date of Outage	Explanation of Outage
Brunswick 1	5/18/2013-5/29/2013	Scheduled maintenance to address recirculation pump 1B seal degradation and replace 2 safety related transformers.
Brunswick 2	3/2/2013-5/9/2013	Scheduled Refueling - EOC 21; includes 13 day extension.
Harris 1	5/15/2013-6/7/2013	Unscheduled maintenance to repair head penetration.
Harris 1	11/9/2013-12/11/2013	Scheduled Refueling - EOC 18; includes 6 day extension.
Robinson 2	9/14/2013-11/4/2013	Scheduled Refueling - EOC 28.

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2014-1-E**

**In Re:** )  
 )  
**Duke Energy Progress, Inc. Annual** )  
**Review of Base Rates for Fuel Costs** )  
 )  
\_\_\_\_\_ )

**T. PRESTON GILLESPIE, JR.**  
**CONFIDENTIAL EXHIBIT 3**

**FILED UNDER SEAL**

**MAY 8, 2014**

DUKE ENERGY PROGRESS  
SOUTH CAROLINA ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS  
NUCLEAR OUTAGE SCHEDULE FOR BILLING PERIOD OF  
JULY 2014 THROUGH JUNE 2015

Scheduled Nuclear Outages Lasting One Week Or More - Billing Period

Station/Unit	Date of Outage <sup>1</sup>	Explanation of Outage
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**REDACTED**

<sup>1</sup> This exhibit represents DEP's current plan, which is subject to change based on fluctuations in operational and maintenance requirements.

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2014-1-E**

In the Matter of  
Annual Review of Base Rates  
for Fuel Costs for  
Duke Energy Progress, Inc.

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**DIRECT TESTIMONY OF  
KIMBERLY D. MCGEE FOR DUKE  
ENERGY PROGRESS, INC.**

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1     **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2     A.     My name is Kimberly D. McGee, and my business address is 550 South Tryon  
3             Street, Charlotte, North Carolina.

4     **Q.     BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5     A.     I am a Rates Manager supporting both Duke Energy Progress, Inc. ("DEP" or the  
6             "Company") and Duke Energy Carolinas, LLC ("DEC")(collectively, the  
7             "Companies").

8     **Q.     PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND**  
9             **PROFESSIONAL EXPERIENCE.**

10    A.     I graduated from the University of North Carolina at Charlotte with a Bachelor of  
11            Science degree in Accountancy. I am a certified public accountant licensed in the  
12            State of North Carolina. I began my career in 1989 with Deloitte and Touche,  
13            LLP as a staff auditor. In 1992, I began working with DEC (formerly known as  
14            Duke Power Company) as a staff accountant and have held a variety of positions  
15            in the finance organization. From 1997 until 2009, I worked for Wachovia Bank  
16            (now known as Wells Fargo) in a variety of finance and regulatory positions. I  
17            rejoined DEC in January 2009 as a Lead Accountant in Financial Reporting. I  
18            joined the Rates Department in 2011 as Manager, Rates and Regulatory Filings.

19    **Q.     HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**  
20            **PROCEEDINGS?**

21    A.     No. I have not previously testified before the Public Service Commission of  
22            South Carolina ("PSCSC" or the "Commission"). I have previously testified,  
23            however, before the North Carolina Utilities Commission supporting the rate

1 calculation for DEC's Demand Side Management and Energy Efficiency Rider in  
2 Docket No. E-7, Sub 1031.

3 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

4 A. The purpose of my testimony is to provide DEP's actual fuel and environmental  
5 cost data for March 1, 2013 through February 28, 2014 (the "review period"), the  
6 projected fuel and environmental cost information for March 1, 2014 through  
7 June 30, 2014 (the "forecast period"), and DEP's proposed fuel factors by  
8 customer class for July 1, 2014 through June 30, 2015 (the "billing period"). I  
9 will provide six exhibits to support my testimony.

10 **Q. WHAT IS THE SOURCE OF THE ACTUAL INFORMATION AND DATA**  
11 **FOR THE REVIEW PERIOD?**

12 A. Actual test period kilowatt hour ("kWh") generation, kWh sales, fuel-related  
13 revenues, and fuel-related expenses were taken from DEP's books and records.  
14 These books, records, and reports of DEP are subject to review by the appropriate  
15 regulatory agencies in the three jurisdictions that regulate DEP's electric rates.

16 In addition, independent auditors perform an annual audit to provide  
17 assurance that, in all material respects, internal accounting controls are operating  
18 effectively and DEP's financial statements are accurate.

19 **Q. DOES DEP PURCHASE POWER AND HOW ARE THESE COSTS**  
20 **RECORDED?**

21 A. Yes. The Company continuously evaluates purchasing power if it can be reliably  
22 procured and delivered at a price that is less than the variable cost of DEP's  
23 generation. In accordance with § 58-27-865(A) of the Code of Laws of South



1 Carolina ("S.C. Code Ann." or the "Code"), DEP recovers from its South  
2 Carolina retail customers an amount that is the lower of the purchase price or  
3 DEP's avoided variable cost for generating an equivalent amount of power for its  
4 economy purchases.

5 The Company also purchases power from certain suppliers that are treated  
6 as firm generation capacity purchases. In accordance with the statute, all amounts  
7 paid to these suppliers are recorded as recoverable fuel costs with the exception of  
8 capacity charges. DEP also purchases (and sells) power to DEC as a result of the  
9 Joint Dispatch Agreement ("JDA") described in Company witness Weintraub's  
10 testimony. According to his testimony, under the joint dispatch process, the  
11 energy cost attributable to each utility's native load are the costs actually incurred  
12 by the utility for energy allocated to native load service, adjusted by the cost  
13 allocation payments calculated by the Joint Dispatcher, which are treated as  
14 purchases and sales between the Companies.

15 **Q. PLEASE EXPLAIN MCGEE EXHIBIT NO. 1.**

16 A. McGee Exhibit No. 1 is a summary of DEP's recommended base fuel rate of  
17 2.981¢/kWh for the billing period, consisting of a projected component of 2.654  
18 ¢/kWh for the recovery of the South Carolina retail share of the \$1.5 billion of  
19 projected system fuel expense, and a true-up component of 0.304¢/kWh to collect  
20 the projected \$19.6 million under-recovery from South Carolina customers.  
21 DEP's recommended Environmental rate of .042¢/kWh consists of a projected  
22 component of 0.058¢/kWh for the recovery of \$1.4 million of projected South  
23 Carolina environmental expenses, and a true-up component of (0.016)¢/kWh to

1 return to South Carolina customers \$0.4 million of over-recovery. The  
2 environmental factor for General Service demand customers is 14¢/kW to recover  
3 \$1.3 million of projected South Carolina environmental expenses offset by a true-  
4 up component of \$69,385 of over-collections.

5 **Q. HOW DID DEP'S FUEL REVENUE BILLINGS COMPARE TO THE**  
6 **FUEL COSTS INCURRED DURING THE MARCH 2013 TO JUNE 2014**  
7 **TIME PERIOD?**

8 A. McGee Exhibit No. 2 is a monthly comparison of fuel revenues billed to South  
9 Carolina retail customers to the actual and estimated jurisdictional fuel costs  
10 attributable to those sales. As shown on Exhibit 2, the projected DEP fuel  
11 recovery status at June 30, 2014 is an under-recovery of \$19.6 million. This  
12 balance is primarily the result of extreme weather conditions in January of 2014  
13 which resulted in higher fuel costs.

14 **Q. PLEASE EXPLAIN MCGEE EXHIBIT NO. 3.**

15 A. McGee Exhibit No. 3 presents DEP's recommended projected base fuel rate of  
16 2.654¢/kWh for the billing period for the recovery of South Carolina retail share  
17 of \$1.5 billion of projected system fuel expense.

18 The fuel forecast supporting the projected fuel cost was generated by an  
19 hourly dispatch model that considers the latest forecasted fuel prices, outages at  
20 the generating plants based on planned maintenance and refueling schedules,  
21 forced outages based on historical trends, generating unit performance  
22 parameters, and expected market conditions associated with power purchase and  
23 off-system sales opportunities. In addition, the forecasting model reflects the

1 joint dispatch of the combined power supply resources of DEP and DEC as  
2 described by Company witness Weintraub.

3 **Q. PLEASE PROVIDE A STATUS UPDATE OF ENVIRONMENTAL COST**  
4 **COLLECTION AND EXPLAIN HOW THESE COSTS HAVE BEEN**  
5 **TREATED IN THIS FILING.**

6 **A.** During the review period, DEP recovered variable environmental costs and the  
7 costs of emission allowances through the environmental component of the fuel  
8 rate. Environmental costs allocated to the South Carolina retail jurisdiction  
9 during the review period were approximately \$2.0 million as shown on McGee  
10 Exhibit No. 4. The Company currently estimates that its deferred environmental  
11 cost balance will be an over-collection of \$0.4 million at June 30, 2014.

12 **Q. HAVE YOU PROVIDED A FORECAST OF ENVIRONMENTAL COSTS?**

13 **A.** Yes, McGee Exhibit No. 5 presents DEP's estimated system environmental costs  
14 for the billing period of \$23.0 million. The South Carolina retail portion is  
15 forecasted to be approximately \$2.7 million.

16 **Q. PLEASE DESCRIBE EMISSION-REDUCING CHEMICALS THAT DEP**  
17 **WILL INCLUDE IN THE PROPOSED FUEL RATE IN THIS FILING.**

18 **A.** As Company witness Miller explains more specifically in his testimony, DEP uses  
19 emission-reducing chemicals at its fossil/hydro plants to help it provide low cost,  
20 reliable electric generation for its customers while also complying with state and  
21 federal environmental control obligations. As a result, DEP has included the cost  
22 of magnesium hydroxide, calcium carbonate, ammonia, urea, limestone, lime, and

1 hydrated lime incurred during the review period in its fuel cost recovery  
2 application.

3 **Q. HOW DID DEP ALLOCATE ENVIRONMENTAL COSTS?**

4 A. Environmental costs were allocated to Residential, General Service (non-  
5 demand), and General Service (demand) rate classes based upon the coincident  
6 peak experienced during the review period. This allocation is shown on McGee  
7 Exhibit No. 4. Rates were designed based on costs allocated to the respective rate  
8 classes and the projected energy consumption for the Residential and General  
9 Service (non-demand) schedules. The rate for the General Service (demand) class  
10 was based on projected annual demand. All allocations were consistent with the  
11 methodology approved by this Commission in DEP's 2007 fuel review  
12 proceeding, Order No. 2007-440 issued July 20, 2007. This methodology has  
13 been consistently used in each fuel case since the issuance of this Order.

14 **Q. HAVE YOU PRESENTED DEP'S PROPOSED FUEL FACTORS?**

15 A. Yes. McGee Exhibit No. 1 presents proposed fuel rates including an amount  
16 added to account for the 5% discount provided to residential customers under  
17 DEP's SC Residential Service Energy Conservation Discount Rider RECD-2C.

18 **Q. WHY DOES DEP PROPOSE INCLUSION OF THE EFFECTS OF RIDER  
19 RECD-2C?**

20 A. The Company should not reflect fuel revenue collections for 100% of its fuel  
21 billings while simultaneously providing a 5% discount on the total bill as required  
22 by Rider RECD-2C. As shown on McGee Exhibit No. 6, this discount impacts  
23 approximately 15% of DEP's South Carolina residential sales. The Company's

1 request in this proceeding is consistent with this Commission's Orders issued in  
2 all of DEP's fuel proceedings since 2009.

3 **Q. DO YOU BELIEVE DEP'S ACTUAL FUEL COSTS INCURRED DURING**  
4 **THE PERIOD WERE REASONABLE?**

5 **A.** Yes. I believe the costs were reasonable and that DEP has demonstrated that it  
6 met the criteria set forth in § 58-27-865(F) of the Code. These costs also reflect  
7 DEP's continuing efforts to maintain reliable service and an economical  
8 generation mix, thereby minimizing the total cost of providing service to DEP's  
9 South Carolina retail customers.

10 **Q. HOW ARE MERGER FUEL-RELATED SAVINGS HANDLED IN DEP'S**  
11 **RECOMMENDED FUEL RATES?**

12 **A.** As Company witness Weintraub states in his testimony, merger fuel-related  
13 savings automatically flow through to DEP's retail customers through the fuel and  
14 fuel-related cost component of customers' rates. Actual merger savings during  
15 the review period are included in the true-up portion of the proposed fuel and  
16 fuel-related cost factors. In addition, in the prospective component of the factors,  
17 the projected merger savings related to procuring coal and reagents, lower  
18 transportation costs, lower gas capacity costs, and coal blending are reflected in  
19 the cost of fossil fuel. Projected joint dispatch savings, which are the result of  
20 using the combined systems' lowest cost available generation to meet total  
21 customer demand, are also reflected in the cost of fossil fuel, as well as the  
22 projected cost purchases and sales that include the purchases and sales between

DEP and DEC. Actual and projected savings related to the procurement of nuclear fuel are reflected in the cost of nuclear fuel.

**Q. WHAT IS THE IMPACT TO CUSTOMERS' BILLS IF THE PROPOSED FUEL AND FUEL-RELATED COST FACTORS ARE APPROVED BY THE COMMISSION?**

**A.** The impact of the proposed fuel rate increase for an average residential customer using 1000 kWh per month is an increase of \$0.35, or 0.3%. Impacts for commercial and industrial customers vary by customer, but are approximately 0.6% and 0.8%, respectively.

	Residential	General Service Non-Demand	General Service Demand <sup>(1)</sup>	Lighting
Proposed Total Fuel Factor in ¢/kWh	3.023	2.997	2.958	2.958
Existing Total Fuel Factor in ¢/kWh	2.988	2.957	2.910	2.910
<sup>(1)</sup> The environmental rate for these customers is 14 ¢/kW				

**Q. WHAT ARE THE KEY DRIVERS IMPACTING THE PROPOSED FUEL FACTOR?**

**A.** A number of factors contribute to the increase in the proposed total fuel cost factors for all customer classes. Total fuel costs projected for the billing period, including environmental, are declining primarily due to lower coal prices, as well as the expected suspension of the U.S. Department of Energy ("DOE") nuclear waste disposal fees beginning in May 2014, as discussed in Company witness Church's testimony. This decline is offset by a \$19.6 million under-collection of fuel costs. This large under-collection was primarily due to the extreme weather conditions experienced in January 2014 during the Polar Vortex which led to higher fuel costs. The resulting increased usage required more frequent operation

1 of DEP's higher cost generating units as well as an increase in purchases of power  
2 at higher costs. The high demand across the country for electricity led to  
3 increases in prices which had a significant impact on DEP since the majority of its  
4 generation consists of gas-fired generation. The fuel rate increase experienced  
5 during this time would have been higher had it not been for the ability of the  
6 Company to leverage its diverse generating resources and utilize the benefits of  
7 joint dispatch from the combined portfolio of DEP's and DEC's resources.

8 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

9 **A. Yes, it does.**

DUKE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
CALCULATION OF TOTAL FUEL COMPONENT  
BILLING PERIOD JULY 31, 2014 TO JUNE 30, 2015

Line No.	Description	Reference	Customer Class			
			Cents/ kWh			
			Residential	General Service (non demand)	Lighting	General Service (demand)
Base Fuel Costs						
1	Base Fuel Cost Component Under/ (Over) Collection at June 2014	Exhibit 2	0.304	0.304	0.304	0.304
2	Base Fuel Cost Component Projected Billing Period	Exhibit 3	2.654	2.654	2.654	2.654
3	Total Base Fuel Cost Component	Line 1 + Line 2	2.958 [1]	2.958	2.958	2.958
4	Total Base Fuel Cost Component Increased for RECD	Line 3 * RECD factor	2.981			
Environmental Costs			Cents / kWh			Cents / kW
5	Environmental Component Under / (Over) Collection at June 2014	Exhibit 4 Page 1.3	(0.016)	(0.013)	N/A	(11)
6	Environmental Component Projected Billing Period	Exhibit 5	0.058	0.052	N/A	15
7	Total Environmental Component	Line 5 + 6	0.042 [1]	0.039	N/A	14 [2]
8	Total Environmental Cost Component Increased for RECD	Line 7 * RECD factor	0.042			
Sum Total Base Fuel + Total Environmental			3.023	2.997	2.958	2.958
9	Total Fuel Cost Factor					

**Notes:**

[1] RECD factor is .7683% and is calculated on Exhibit 6

[2] The environmental rate for these customers is 14 cents per kW as calculated on exhibits 4 & 5



DUKE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
GAUARDIAN OF BASE FUEL OVER (UNDER) RECOVERY  
ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2014

		Review Period	Review Period	Review Period	Review Period	Review Period	Review Period
Unit No.	Description	March 2013	April 2013	May 2013	June 2013	July 2013	August 2013
1	Coal	\$ 59,023,496	\$ 43,097,099	\$ 39,384,507	\$ 68,394,024	\$ 74,701,746	\$ 71,474,074
2	Gas	44,908,344	87,485,171	55,019,111	56,372,613	62,313,254	61,295,186
3	Nuclear Fuel	12,195,462	115,426,21	10,962,560	14,781,680	16,348,895	15,487,581
4	Electricity	40,417,205	16,895,548	27,853,881	21,117,955	27,127,787	29,954,211
5	Fuel Expense Recovered Through Inter-System Sales	(11,612,842)	(15,683,151)	(11,788,254)	(13,159,033)	(124,068,728)	(27,632,582)
6	Total Fuel Costs	144,926,665	103,305,989	121,411,765	137,487,199	156,547,958	150,608,510
7	Total System IOWH Sales	4,396,488,986	4,256,166,012	3,849,422,774	4,292,511,033	5,050,038,599	5,240,619,945
8	Fuel Costs Incurred c/kwh	3.296	2.427	3.156	3.203	3.100	2.871
9	Fuel Costs Billed c/kwh	1.629	1.628	1.628	2.636	2.910	2.910
10	SC Retail Sales KWH	474,712,940	554,895,417	452,740,595	466,778,249	602,531,741	613,182,765
11	Over / (Under) Current Month	(Line 9 - Line 8) * Line 10 / 100	(3,168,208)	1,114,187	(2,388,586)	(2,646,429)	(1,144,433)
12	Over / (Under) Cumulative Balance - February 2013	Prior Annual Balance	895,513				241,704
13	Accounting Adjustment(s)						
14	Over / (Under) Cumulative Balance	Prior Month Balance + Line 11 - Line 12	(2,272,615)	(1,198,620)	(3,547,214)	(6,193,643)	(7,338,066)
Mo							
Unit No.	Description	Review Period September 2013	Review Period October 2013	Review Period November 2013	Review Period December 2013	Review Period January 2014	Review Period February 2014
15	Coal	50,932,314	36,581,724	48,338,863	39,417,040	64,711,948	72,721,487
16	Gas	56,429,193	57,822,803	65,746,573	70,265,959	160,856,870	94,980,661
17	Nuclear Fuel	13,579,070	12,571,269	11,495,873	15,333,995	16,231,806	14,943,869
18	Electricity	20,695,746	14,655,677	25,578,317	22,340,333	87,646,010	33,019,235
19	Fuel Expense Recovered Through Inter-System Sales	(14,344,063)	(14,164,285)	(15,633,999)	(12,265,629)	(46,021,193)	(22,880,038)
20	Total Fuel Costs	107,292,260	110,991,188	135,925,727	125,091,698	283,425,481	141,995,404
21	Total System IOWH Sales	4,425,821,775	4,051,620,575	3,941,130,262	4,605,941,090	5,389,113,675	4,912,803,212
22	Fuel Costs Incurred c/kwh	2.876	2.739	3.449	2.716	5.259	2.890
23	Fuel Costs Billed c/kwh	2.910	2.910	2.910	2.911	2.911	2.911
24	SC Retail Sales KWH	518,884,686	500,614,334	468,689,255	498,488,980	612,208,970	570,388,942
25	Over / (Under) Current Month	(Line 23 - Line 22) * Line 24 / 100	175,761	853,920	(2,525,707)	972,667	(14,376,020)
26	Accounting Adjustment(s)	199,743	13,278				117,995
27	Over / (Under) Cumulative Balance	Prior Month Balance + Line 25 + Line 26	(6,710,858)	(5,853,864)	(8,379,440)	(7,406,774)	(11,782,888)
Mo							
Unit No.	Description	Estimated March 2014	Estimated April 2014	Estimated May 2014	Estimated June 2014		
28	Coal	65,498,436	181,483,826	29,364,590	50,327,753		
29	Gas	70,681,262	64,052,010	56,659,755	72,683,058		
30	Nuclear Fuel	11,629,348	12,483,177	13,824,784	13,688,568		
31	Electricity	40,484,955	16,488,297	20,358,001	25,646,613		
32	Fuel Expense Recovered Through Inter-System Sales	(17,939,854)	(15,165,588)	(17,043,037)	(33,088,879)		
33	Total Fuel Costs	170,354,086	95,906,751	101,164,093	128,657,113		
34	Total System IOWH Sales	4,396,971,975	3,684,122,704	4,236,064,441	4,858,782,381		
35	Fuel Costs Incurred c/kwh	1.874	1.603	2.435	2.648		
36	Fuel Costs Billed c/kwh	2.911	2.911	2.911	2.911		
37	SC Retail Sales KWH	512,144,615	450,967,276	509,440,381	559,033,407		
38	Over / (Under) Current Month	(Line 36 - Line 35) * Line 37 / 100	(4,935,764)	1,386,106	2,421,025		
39	Accounting Adjustment(s)	1,673,255			1,468,459		
40	Over / (Under) Cumulative Balance	Prior Month Balance + Line 38 + Line 39	(24,829,945)	(13,443,439)	(21,022,804)		
Mo							
41	SC Retail Sales July 2014 - June 2015				6,440,983,739		
42	SC Base Fuel Increment / (Decrement) Calculation Rate (c/kwh)	Line 40 / Line 41 * 100			0.304 c/kwh		

DUKE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
PROJECTED BIDDING PERIOD BASE FUEL COSTS  
FOR THE 12 MONTHS ENDING JULY 31, 2014 TO JUNE 30, 2015

Line No.	Description	Reference	July 2014	August 2014	September 2014	October 2014	November 2014	December 2014
1	Coal		\$ 63,804,808	\$ 50,232,382	\$ 42,746,498	\$ 23,215,817	\$ 26,932,561	\$ 56,154,626
2	Gas		78,215,713	\$ 77,494,462	\$ 62,514,776	\$ 51,316,987	\$ 50,412,503	\$ 41,792,997
3	Nuclear Fuel		14,507,240	14,507,240	13,356,909	14,156,344	14,543,986	13,984,620
4	Purchased Power		29,435,720	27,735,322	21,673,592	19,759,037	16,321,210	22,305,840
5	Fuel Expense Recovered Through Intersystem Sales		(36,871,717)	(34,087,361)	(17,389,093)	(15,183,619)	(17,166,624)	(7,464,678)
6	Total Fuel Costs	Sum Lines 1 through 5	\$ 149,091,763	135,882,044	122,902,680	93,264,566	91,043,636	126,773,405
7	Projected Total System Sales from July 14 - June 15 kWh		5,505,904,133	5,163,088,819	4,657,955,526	3,916,946,610	3,937,838,616	4,937,271,337
8	System Cost per kWh (¢/kwh)	Line 6/Line 7 * 100	2.708	2.632	2.639	2.381	2.312	2.568
9	Projected SC Retail Sales July 14 - June 15 kWh		646,242,413	581,120,628	559,168,065	479,874,821	470,781,977	545,893,455
10	SC Base Fuel Costs	Line 8 * Line 9/100	\$ 17,499,291	\$ 15,293,918	\$ 14,753,952	\$ 11,426,071	\$ 10,884,576	\$ 14,016,806

Line No.	Description	Reference	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	12 Month Total
11	Coal		\$ 71,291,200	\$ 60,710,507	\$ 20,605,208	\$ 33,492,745	\$ 37,325,550	\$ 46,461,136	532,973,040
12	Gas		40,269,831	39,443,029	72,137,007	57,420,931	65,722,573	67,775,655	704,516,463
13	Nuclear Fuel		14,316,360	12,715,095	11,369,547	9,648,659	10,046,068	14,116,763	157,268,831
14	Purchased Power		25,115,861	17,487,521	21,854,655	20,162,829	23,386,989	25,387,617	270,626,192
15	Fuel Expense Recovered Through Intersystem Sales		(10,856,751)	(12,279,392)	(10,199,859)	(11,902,492)	(13,929,560)	(20,425,927)	(207,757,074)
16	Total Fuel Costs	Sum Lines 11 through 15	140,136,502	118,076,760	115,766,558	108,822,672	122,551,621	133,315,244	1,457,627,451
17	Projected Total System Sales from July 14 - June 15 kWh		5,166,274,277	4,405,507,870	4,213,562,814	3,854,463,212	4,240,192,249	4,925,714,406	54,924,719,930
18	System Cost per kWh (¢/kwh)	Line 16/Line 17 * 100	2.713	2.680	2.747	2.823	2.890	2.707	2.654
19	Projected SC Retail Sales July 14 - June 15		609,059,628	499,292,692	484,622,017	477,209,709	508,652,370	579,050,964	6,440,968,739
20	SC Base Fuel Costs	Line 18 * Line 19/100	\$ 16,520,897	\$ 13,382,081	\$ 13,314,865	\$ 13,473,014	\$ 14,701,161	\$ 15,672,107	170,943,310

DUKE ENERGY PROGRESS, INC.  
 SOUTH CAROLINA RETAIL FUEL CASE  
 CALCULATION OF ENVIRONMENTAL OVER / (UNDER) RECOVERY  
 ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2014

Line No.	CP %	Reference	Review Period	Review Period	Review Period	Review Period	Review Period	Review Period
1	2	3	4	5	6	7	8	9
1	Summer 2013 From Confidential Peak (CP) 1WH	45.85%	March 2013	April 2013	May 2013	June 2013	July 2013	August 2013
2								
3	Total Revenues		1,200,497 \$	1,304,694 \$	1,079,229 \$	1,417,344 \$	1,916,731 \$	1,583,076 \$
4	Emission Allowances		33,554	53,003	58,234	92,491	110,320	106,829
5	Off-System Sales		14,670	(193,827)	(73,414)	(3,301,019)	(407,273)	
6	Net Environmental Costs		1,235,311 \$	987,449 \$	1,064,059 \$	1,579,816 \$	1,729,564 \$	1,688,632 \$
7	Total System Sales 1WH		4,196,496,985	4,256,166,018	3,849,422,774	4,293,211,013	5,094,028,599	5,246,619,945
8	Environmental System Costs Incurred (CP)wh		0.0280	0.0232	0.0176	0.0568	0.0346	0.0321
9	SC Retail Sales 1WH		474,712,540	554,893,417	452,740,595	466,779,349	602,531,741	613,182,789
10	SC Environmental Costs		112,715 \$	228,790 \$	125,144 \$	171,793 \$	208,745 \$	197,120 \$
11	Residential Environmental Costs Allocated By Firm CP		60,877 \$	59,087 \$	57,395 \$	78,790 \$	95,737 \$	90,405 \$
12	SC Residential 1WH Sales		202,592,346	172,597,631	123,298,278	156,897,517	182,885,791	224,064,389
13	SC Residential Environmental Costs Incurred (CP)wh		0.0790	0.0394	0.047	0.050	0.052	0.043
14	SC Residential Environmental Costs (CP)wh		0.050	0.050	0.050	0.050	0.054	0.054
15	SC Residential Environmental Costs Over / (Under) Recovery		40,992 \$	27,802 \$	4,254 \$	(341) \$	3,021 \$	21,549 \$
16	Over / (Under) Cumulative Balance - February 2013		158,645					
17	Cumulative SC Residential Environmental Costs Over / (Under) Recovery		199,257 \$	278,459 \$	290,713 \$	290,372 \$	233,393 \$	255,342 \$
18	Total Revenues		1,471,462 \$	1,377,027 \$	1,287,498 \$	883,979 \$	2,280,309 \$	2,014,195 \$
19	Emission Allowances		64,784	40,880	44,801	33,739	38,618	41,272 \$
20	Off-System Sales		(72,153)	(206,317)	(188,489)	(301,157)	(195,062)	(2,872,797)
21	Net Environmental Costs		1,464,473 \$	1,752,470 \$	1,752,470 \$	596,581 \$	2,208,845 \$	1,973,595 \$
22	Total System Sales		4,435,821,775	4,091,610,579	3,941,130,182	4,605,541,090	5,180,113,675	4,812,803,218 \$
23	Environmental System Costs Incurred (CP)wh		0.0335	0.0287	0.0465	0.0710	0.0410	0.0402
24	SC Retail Sales 1WH		514,894,645	520,518,534	466,699,235	499,489,180	611,206,970	570,358,942 \$
25	SC Environmental Costs		174,040 \$	543,514 \$	208,437 \$	64,564 \$	250,979 \$	279,488 \$
26	Residential Environmental Costs Allocated By Firm CP		79,420 \$	63,824 \$	93,596 \$	29,611 \$	115,084 \$	105,150 \$
27	SC Residential 1WH Sales		183,602,066	139,378,963	140,790,214	201,623,601	254,869,774	242,361,982
28	SC Residential Environmental Costs Incurred (CP)wh		0.049	0.046	0.068	0.075	0.045	0.043
29	SC Residential Environmental Costs (CP)wh		0.054	0.054	0.054	0.054	0.054	0.054
30	SC Residential Environmental Costs Over / (Under) Recovery		8,201 \$	8,846 \$	(19,591) \$	79,265 \$	22,545 \$	75,635 \$
31	Cumulative SC Residential Environmental Costs Over / (Under) Recovery		263,543 \$	272,389 \$	252,799 \$	332,064 \$	354,610 \$	380,215 \$
32	Total Revenues		2,579,136 \$	973,971 \$	1,384,335 \$	2,182,861		
33	Emission Allowances		34,648	17,550	34,795	68,213		
34	Off-System Sales		(68,583)	(15,570)	(12,601)	(8,820)		
35	Net Environmental Costs		2,510,999 \$	985,945 \$	1,400,150 \$	2,119,546		
36	Total System Sales		4,206,071,975	3,684,122,704	4,236,064,441	4,058,782,381		
37	Environmental System Costs Incurred (CP)wh		0.0672	0.0528	0.0532	0.0437		
38	SC Retail Sales 1WH		512,146,615	480,887,278	509,460,381	539,091,437		
39	SC Environmental Costs		173,844 \$	110,648 \$	171,498 \$	353,372		
40	Residential Environmental Costs Allocated By Firm CP		174,119 \$	45,351 \$	77,486 \$	117,122		
41	SC Residential 1WH Sales		187,487,878	117,512,245	118,645,067	198,799,062		
42	SC Residential Environmental Costs Incurred (CP)wh		0.072	0.047	0.049	0.059		
43	SC Residential Environmental Costs (CP)wh		0.054	0.054	0.054	0.054		
44	SC Residential Environmental Costs Over / (Under) Recovery		(12,489) \$	8,112 \$	(8,200) \$	(9,870)		
45	Cumulative SC Residential Environmental Costs Over / (Under) Recovery		347,346 \$	335,458 \$	347,258 \$	337,380		
46	SC Residential Environmental Costs Over / (Under) Recovery					2,137,377,003		
47	SC Residential Environmental Costs Over / (Under) Recovery					(10,151)		

SOUTH CAROLINA RETAIL PUMP CASE  
CALCULATION OF ENVIRONMENTAL OVER- / UNDER- RECOVERY  
ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2013

[illegible]

Line No.	Description	2013	2013	2013	2013	2014	2014	Ended Feb 2015
18	Total Reagents							
19	Emulsion Alkylbenzene	1,471,842 \$	1,327,027 \$	1,892,498 \$	863,979 \$	2,280,305 \$	2,056,195 \$	19,019,333 \$
20	Off-System Sales	84,794	40,660	48,801	33,618	47,272	47,272	742,459 \$
21	Net Environmental Costs	1706,1317	1,367,687	1,941,299	897,597	2,327,577	2,103,467	20,761,792 \$
22	Total System Sales							
23	Environmental System Costs Incurred C/wh	Line 21 / Line 22 * 100	4,425,821,775	4,051,620,579	3,941,190,242	4,659,941,090	5,389,113,675	54,417,675,954
24	SC Retail Sales L/wh	0.034	0.022	0.044	0.013	0.044	0.044	0.044
25	SC Environmental Costs	518,684,666	500,616,134	482,689,255	458,489,180	570,382,942	570,382,942	6,374,132,058,954
26	General Service (non-demand) Environmental Cost Allocated by Firm CP	Line 23 * Line 24 / 100	171,040 \$	143,524 \$	208,437 \$	64,964 \$	229,448 \$	2,035,310 \$
27	SC General Service (non-demand) L/wh Sales	Line 25 * Line 2	10,157	8,376	13,785	3,785	13,393	118,778,878
28	SC General Service (non-demand) Environmental Costs Incurred C/wh	Line 26 / Line 27 * 100	26,535,195	23,573,217	20,816,478	23,065,148	26,445,511	300,718,878
29	SC General Service (non-demand) Environmental Costs Allocated C/wh		0.038	0.036	0.028	0.015	0.021	0.038
30	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	Line 29 - Line 28 / Line 27 / 100	2,315 \$	2,704 \$	12,800 \$	8,013 \$	1,023 \$	23,294,943
31	Cumulative SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	Line 30 + Prior Month Cum Bal	34,793 \$	41,496 \$	39,116 \$	47,128 \$	46,100 \$	43,145,433
<b>Overhead</b>								
32	Total Reagents							
33	Emulsion Alkylbenzene	2,529,136 \$	973,971 \$	1,384,355 \$	2,162,281			
34	Off-System Sales	50,088	17,250	34,395	66,322			
35	Net Environmental Costs	2,579,224	985,245	1,408,150	2,228,603			
36	Total System Sales							
37	Environmental System Costs Incurred C/wh	Line 35 / Line 36 * 100	4,296,971,975	3,680,122,704	4,236,006,441	4,863,782,381		
38	SC Retail Sales L/wh	0.057	0.027	0.033	0.046			
39	SC Environmental Costs	512,144,615	450,967,276	509,440,381	599,031,914			
40	General Service (non-demand) Environmental Cost Allocated by Firm CP	Line 37 * Line 38 / 100	287,244 \$	120,648 \$	189,348 \$	255,372		
41	SC General Service (non-demand) L/wh Sales	Line 39 * Line 2	17,063 \$	7,643 \$	9,883 \$	4,403 \$		
42	SC General Service (non-demand) Environmental Costs Incurred C/wh	Line 40 / Line 41 * 100	22,187,934	19,407,497	22,877,068	26,046,745		
43	SC General Service (non-demand) Environmental Costs Allocated C/wh		0.077	0.036	0.043	0.057		
44	SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	Line 43 - Line 42 / Line 41 / 100	0.047	0.047	0.047	0.047		
45	Cumulative SC General Service (non-demand) Environmental Costs Over / (Under) Recovery	Line 44 + Prior Month Cum Bal	38,475 \$	40,354 \$	41,423 \$	38,182		
46	SC Projective General Service (non-demand) Sales July 2014 - June 2015							360,736,591
47	SC General Service (non-demand) Environmental Increment / (Decrement) Calculated Rate (C/wh)	Line 45 / Line 46 * 100						10,014

DUE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
CALCULATION OF ENVIRONMENTAL OVER / (UNDER) RECOVERY  
ACTUAL AND ESTIMATED COSTS AND REVENUES MARCH 2013 - JUNE 2014

General Services (demand)

Line	Description	Reference	CP %	General Service (General)	48 10%	Revenue Period	Revenue Period	Revenue Period	Revenue Period	Revenue Period
						2013	2013	2013	2013	2013
1	Revenue									
2	Revenue									
3	Revenue									
4	Revenue									
5	Revenue									
6	Revenue									
7	Total									
8	Revenue									
9	Revenue									
10	Revenue									
11	Revenue									
12	Revenue									
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DUKE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
PROJECTED BILLING PERIOD ENVIRONMENTAL COSTS  
FOR THE 12 MONTHS ENDING JULY 31, 2014 TO JUNE 30, 2015

Line No.	Class	Summer 2013 Firm Combined Peak (CP) KWs	CP %
1	Residential	505,527	45.8631%
2	General Service (non demand)	64,326	5.8835%
3	General Service (demand)	532,398	48.3010%
	<b>Total SC</b>	<b>1,102,251</b>	<b>100%</b>

Line No.	Description	Reference	July 2014	August 2014	September 2014	October 2014	November 2014	December 2014
4	Total Reagents		\$ 2,486,218	\$ 2,566,959	\$ 1,497,099	\$ 1,387,831	\$ 1,358,927	\$ 2,562,959
5	Emission Allowances		77,748	80,045	45,012	29,906	30,789	65,415
6	Estimated Off-system Sales		(31,119)	(65,406)	(9,648)	(25,142)	(14,633)	(4,898)
7	Net Environmental Costs	Sum Lines 4 through 6	\$ 2,532,847	\$ 2,581,598	\$ 1,532,463	\$ 1,392,595	\$ 1,375,083	\$ 2,623,476
8	Projected Total System Sales from July 14 - June 15		5,500,994,113	5,163,088,819	4,657,955,526	3,916,946,610	3,937,838,616	4,937,271,337
9	Environmental System Costs Incurred c/kwh	Line 7 / Line 8 * 100	0.046	0.050	0.033	0.036	0.035	0.053
10	Projected SC Retail Sales July 14 - June 15		646,242,413	641,120,628	559,168,065	479,874,821	470,781,977	545,893,455
11	SC Environmental Costs	Line 9 * Line 10 / 100	297,256	290,566	183,966	170,610	164,396	289,790

Line No.	Description	Reference	January 2015	February 2015	March 2015	April 2015	May 2015	June 2015	12 Months Ended June 2015
13	Total Reagents		\$ 2,946,022	\$ 2,102,329	\$ 1,022,143	\$ 1,326,283	\$ 1,503,506	\$ 1,874,285	22,914,061
13	Emission Allowances		56,521	45,765	17,218	25,136	25,718	31,167	530,176
14	Estimated Off-system Sales		(114,212)	(4,815)	(9,807)	(140)	(886)	(9,802)	(294,579)
15	Net Environmental Costs	Sum Lines 12 thru 14	2,888,331	2,421,279	1,029,554	1,351,278	1,528,338	1,895,580	23,149,658
16	Projected Total System Sales from July 14 - June 15		5,166,274,277	4,405,507,870	4,213,562,874	3,854,463,212	4,240,190,284	4,925,714,406	54,924,719,930
17	Environmental System Costs Incurred c/kwh	Line 15 / Line 16 * 100	0.056	0.055	0.024	0.035	0.036	0.038	
18	Projected SC Retail Sales July 14 - June 15		609,059,628	592,927,692	484,227,017	477,109,709	501,652,370	579,050,964	6,440,968,739
19	SC Environmental Costs	Line 17 * Line 18 / 100	340,510	274,413	118,414	167,298	183,339	222,838	2,703,396

20	SC Environmental Costs Allocated on CP KWs								
20	Residential	Total Line 19 * Line 1							\$ 1,239,862
21	General Service (non demand)	Total Line 19 * Line 2							157,767
22	General Service (demand)	Total Line 19 * Line 3							1,305,766
23	Total SC	Sum Lines 20 through 22							\$ 2,703,396

24	Projected Retail Sales kWh								
24	Residential								2,103,737,003
25	General Service (non demand)								301,500,320
26	General Service (demand)								3,898,612,603
27	Effluent								103,478,814
28	Total SC	Sum Lines 24 through 27							6,440,968,739

29	Projected Average Environmental Fuel Cost c/kwh								
29	Residential	Line 20 / Line 24 * 100							0.058
30	General Service (demand)	Line 21 / Line 25 * 100							0.052

31	Projected SC Environmental Fuel Cost c/kwh								8,440,978
32	General Service (demand)	Line 22 / Line 31 * 100							15 c/kwh

DUKE ENERGY PROGRESS, INC.  
SOUTH CAROLINA RETAIL FUEL CASE  
REVENUE ADJUSTMENT FACTOR FOR RECD  
FOR THE 12 MONTHS ENDING MARCH 31, 2013 TO FEBRUARY 28, 2014

**Residential Adjustment Factor**

(1) Billed kWh (12ME 2/28/14)	Per Books	2,215,371,902	
(2) Billed RECD kWh (12ME 2/28/14)		<u>340,414,857</u>	(a)
(3) RECD kWh Percent of Total Billed	Line 2 / Line 1	15.3660%	
(4) RECD Discount	RECD Discount	<u>5.0000%</u>	(b)
(5) RECD Impact (Weighted Discount)	Line 3 X Line 4	0.7683%	

**Notes:**

(a) Energy billed and discounted pursuant to Residential Energy Conservation Discount, Rider RECD-2C

(b) Five-percent discount provided under Residential Energy Conservation Discount, Rider RECD-2C.

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2014-1-E**

In the Matter of	)	<b>DIRECT TESTIMONY OF</b>
Annual Review of Base Rates	)	<b>JOSEPH A. MILLER, JR. FOR</b>
for Fuel Costs for	)	<b>DUKE ENERGY PROGRESS, INC.</b>
Duke Energy Progress, Inc.	)	

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1    **Q.    PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A.    My name is Joseph A. Miller, Jr. and my business address is 526 South Church  
3       Street, Charlolle, North Carolina 28202.

4    **Q.    BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5    A.    I am interim Vice President of Central Engineering and Services for Duke Energy  
6       Business Services, LLC, which is a service company subsidiary of Duke Energy  
7       Corporation ("Duke Energy") that provides services to Duke Energy and its  
8       subsidiaries, including Duke Energy Progress, Inc. ("DEP" or the "Company") and  
9       Duke Energy Carolinas, LLC ("DEC").

10   **Q.    PLEASE BRIEFLY DESCRIBE YOUR EDUCATIONAL AND**  
11   **PROFESSIONAL BACKGROUND.**

12   A.    I graduated from Purdue University with a Bachelor of Science degree in  
13       mechanical engineering. I also completed twelve post graduate level courses in  
14       Business Administration at Indiana State University. My career began with Duke  
15       Energy (d/b/a Public Service of Indiana) in 1991 as a staff engineer at Duke Energy  
16       Indiana's Cayuga Steam Station. Since that time, I have held various roles of  
17       increasing responsibility in the generation engineering, maintenance, and operations  
18       areas, including the role of station manager, first at Duke Energy Kentucky's East  
19       Bend Steam Station, followed by Duke Energy Ohio's Zimmer Steam Station. I was  
20       named General Manager of Analytical and Investments Engineering in 2010, and  
21       was named General Manager of Strategic Engineering in July 2012 following the  
22       merger between Duke Energy and Progress Energy, Inc. I was named interim Vice  
23       President of Central Engineering and Services in February 2014.

1 Q. WHAT ARE YOUR DUTIES AS VICE PRESIDENT OF CENTRAL  
2 ENGINEERING AND SERVICES?

3 A. In this role, I am responsible for providing direction and oversight for engineering  
4 and business services including design, standards, and consulting along with  
5 strategic services, technical services such as NERC compliance, and environmental  
6 compliance for DEP's fleet of fossil and hydroelectric ("hydro" and collectively,  
7 "fossil/hydro") facilities.

8 Q. HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR  
9 PROCEEDINGS?

10 A. Yes. I testified before Public Service Commission of South Carolina in DEP's 2013  
11 annual fuel proceeding in Docket No. 2013-I-E, as well as in DEC's 2012 and 2013  
12 annual fuel proceedings in Docket Nos. 2012-3-E and 2013-3-E, respectively. I  
13 have also testified on multiple occasions on behalf of Duke Energy in proceedings  
14 before this and other state commissions.

15 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS  
16 PROCEEDING?

17 A. The purpose of my testimony is to (1) describe DEP's generation portfolio and  
18 changes made since the prior year's filing, (2) discuss the performance of DEP's  
19 fossil/hydro facilities during the period of March 1, 2013 through February 28, 2014  
20 (the "review period"), (3) provide information on significant outages that occurred  
21 during the review period, and (4) discuss DEP's environmental compliance efforts.

1 Q. PLEASE DESCRIBE DEP'S FOSSIL/HYDRO GENERATION  
2 PORTFOLIO.

3 A. The Company's fossil/hydro generation portfolio consists of 9,175<sup>1</sup> megawatts  
4 ("MWs") of generating capacity, made up as follows:

5	Coal-fired <sup>2</sup> -	3,328 MWs
6	Combustion Turbines -	2,999 MWs
7	Combined Cycle Turbines -	2,626 MWs
8	Hydro -	222 MWs

9 The 3,328 MWs of coal-fired generation represent three generating stations  
10 and a total of seven units. These units are equipped with emission control  
11 equipment, including selective catalytic reduction ("SCR") equipment for removing  
12 nitrogen oxides ("NO<sub>x</sub>"), flue gas desulfurization ("FGD" or "scrubber") equipment  
13 for removing sulfur dioxide ("SO<sub>2</sub>"), and low NO<sub>x</sub> burners. This inventory of coal-  
14 fired assets with emission control equipment employed enhances DEP's ability to  
15 maintain current environmental compliance and concurrently utilize coal with  
16 increased sulfur content – providing flexibility for DEP to procure the best cost  
17 options for coal supply.

18 The Company has a total of 36 simple cycle combustion turbine ("CT")  
19 units, the larger 14 of which provide 2,205 MWs, or 73.5% of capacity. These 14  
20 units are located at the Asheville, Darlington, Richmond County, and Wayne County  
21 facilities, and are equipped with water injection and/or low NO<sub>x</sub> burners for NO<sub>x</sub>  
22 control. The 2,626 MWs shown as "Combined Cycle Turbines" ("CC") represent

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<sup>1</sup> As of 3/17/2014 representing DEP's ownership share.

<sup>2</sup> Represents DEP's 83.83% and 87.06% ownership share respectively for Mayo and Roxboro.

1 four power blocks. The Lee Energy Complex CC power block ("Lee CC") has a  
2 configuration of three CTs and one steam turbine. The two Richmond County  
3 power blocks located at the Smith Energy Complex consist of two CTs and one  
4 steam turbine each. The most recent CC addition began commercial operation on  
5 November 27, 2013 at Sutton Energy Complex ("Sutton CC") in Wilmington, North  
6 Carolina and consists of two CTs and one steam turbine. Within these CC power  
7 blocks, all nine CTs are equipped with low NO<sub>x</sub> burners, SCR equipment, and  
8 carbon monoxide volatile organic compound catalysts. The steam turbines do not  
9 combust fuel and, therefore, do not require NO<sub>x</sub> controls. The Company's hydro  
10 fleet consists of 15 units providing approximately 222 MWs of capacity.

11 **Q. WHAT CHANGES HAVE OCCURRED WITHIN THE FOSSIL/HYDRO**  
12 **PORTFOLIO SINCE DEP'S 2013 ANNUAL FUEL PROCEEDING?**

13 A. Changes within the portfolio include the addition of 622 MWs of capacity at Sutton  
14 CC. Also within the review period, DEP retired Sulton coal-fired Units 1, 2, and 3.  
15 These retirements in November 2013 reduced capacity by 553 MWs<sup>3</sup>, retiring units  
16 that began commercial operation between 1954 and 1972. The CT fleet was reduced  
17 by a total of 261 MWs with the March 2013 retirement of the remaining units at  
18 Cape Fear and Robinson Stations that began commercial operation between 1968  
19 and 1969.

20 **Q. ARE OTHER CAPACITY CHANGES POSSIBLE WITHIN DEP'S**  
21 **FOSSIL/HYDRO PORTFOLIO IN THE NEXT FEW YEARS?**

22 A. Yes. In February 2014, DEP announced that it has entered discussions with North  
23 Carolina Eastern Municipal Power Agency ("NCEMPA") regarding the potential

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<sup>3</sup> Summer capacity ratings as noted in 2013 DEP Integrated Resource Plan.

1 purchase of NCEMPA's portions of Roxboro Unit 4 and Mayo Unit 1. This  
2 purchase, if completed, would bring DEP's ownership to 100% and add 208 MWs to  
3 DEP's coal-fired portfolio.

4 **Q. WHAT ARE DEP'S OBJECTIVES IN THE OPERATION OF ITS**  
5 **FOSSIL/HYDRO FACILITIES?**

6 A. The primary objective of DEP's fossil/hydro generation department is to safely  
7 provide reliable and cost-effective electricity to DEP's Carolinas customers. The  
8 Company achieves this objective by focusing on a number of key areas. Operations  
9 personnel and other station employees are well-trained and execute their  
10 responsibilities to the highest standards in accordance with procedures, guidelines,  
11 and a standard operating model. Like safety, environmental compliance is a "first  
12 principle" and DEP works very hard to achieve high level results.

13 The Company achieves compliance with all applicable environmental  
14 regulations and maintains station equipment and systems in a cost-effective manner  
15 to ensure reliability. The Company also takes action in a timely manner to  
16 implement work plans and projects that enhance the safety and performance of  
17 systems, equipment, and personnel, consistent with providing low-cost power  
18 options for DEP's customers. Equipment inspection and maintenance outages are  
19 generally scheduled during the spring and fall months when electricity demand is  
20 reduced due to weather conditions. These outages are well-planned and executed  
21 with the primary purpose of preparing the unit for reliable operation until the next  
22 planned outage.

1    **Q.    HOW MUCH GENERATION DID EACH TYPE OF GENERATING**  
2    **FACILITY PROVIDE FOR THE REVIEW PERIOD?**

3    A.    For the review period, DEP's total system generation was 61,538,758 MW hours  
4    ("MWHs"), of which 34,637,477 MWHs, or approximately 57%, was provided by  
5    the fossil/hydro fleet. The breakdown includes a 28% contribution from coal-fired  
6    stations, an approximately 27% contribution from gas facilities, and an  
7    approximately 2% contribution from hydro facilities.

8           The Company's portfolio includes a diverse mix of units that, along with  
9    additional nuclear capacity, allow DEP to meet the dynamics of customer load  
10   requirements in a logical and cost-effective manner. Additionally, DEP has utilized  
11   the Joint Dispatch Agreement ("JDA"), described further in Company witness  
12   Weintraub's testimony, which allows generating resources for DEP and DEC to be  
13   dispatched as a single system to enhance dispatching at the lowest possible cost.  
14   The cost and operational characteristics of each unit generally determine the type of  
15   customer load situation (e.g., base and peak load requirements) that a unit would be  
16   called upon or dispatched to support.

17   **Q.    HOW DID DEP COST EFFECTIVELY DISPATCH THE DIVERSE MIX OF**  
18   **GENERATING UNITS DURING THE REVIEW PERIOD?**

19   A.    The Company, like other utilities across the U.S., has experienced a change in the  
20   dispatch order for each type of generating facility due to favorable economics  
21   resulting from the low pricing of natural gas which includes the expansion of shale  
22   gas as described in Company witness Weintraub's testimony. Further, the addition  
23   of new combined cycle units within DEP's portfolio in recent years has provided

1 DEP with additional natural gas resources that feature state-of-the-art technology for  
2 increased efficiency, fuel flexibility, and significantly reduced emissions. These  
3 factors promote the use of natural gas and provide real benefits in both pricing and  
4 reduced emissions for customers.

5 **Q. WHAT WAS THE HEAT RATE FOR DEP'S COAL-FIRED FLEET**  
6 **DURING THE REVIEW PERIOD?**

7 A. Heat rate is a measure of the amount of thermal energy needed to generate a given  
8 amount of electric energy and is expressed as British thermal units ("Btu") per  
9 kilowatt-hour ("kWh"). A low heat rate indicates an efficient fleet that uses less heat  
10 energy from fuel to generate electrical energy. Over the review period, the average  
11 heat rate for the most active coal-fired units – excluding those retired during the  
12 review period – was 11,098 Btu/kWh. The most active station during this period  
13 was Roxboro, providing 68% of the coal production with an average of heat rate of  
14 10,662 Btu/kWh.

15 **Q. PLEASE DISCUSS THE OPERATIONAL RESULTS FOR DEP'S**  
16 **FOSSIL/HYDRO FLEET DURING THE REVIEW PERIOD.**

17 A. The Company's generating units operated efficiently and reliably during the test  
18 period. Several key measures are used to evaluate the operational performance  
19 depending on the generator type: (1) equivalent availability factor ("EAF"), which  
20 refers to the percent of a given time period a facility was available to operate at full  
21 power, if needed (EAF is not affected by the manner in which the unit is dispatched  
22 or by the system demands; it is impacted, however, by planned and unplanned  
23 maintenance (*i.e.*, forced) outage time); (2) net capacity factor ("NCF"), which

measures the generation that a facility actually produces against the amount of generation that theoretically could be produced in a given time period, based upon its maximum dependable capacity (NCF is affected by the dispatch of the unit to serve customer needs); (3) equivalent forced outage rate ("EFOR"), which represents the percentage of unit failure (unplanned outage hours and equivalent unplanned derated<sup>4</sup> hours); a low EFOR represents fewer unplanned outage and derated hours, which equates to a higher reliability measure; and, (4) starting reliability ("SR"), which represents the percentage of successful starts.

The following chart provides operation results categorized by generator type, as well as results from the most recently published North American Electric Reliability Council ("NERC") Generating Unit Statistical Brochure ("NERC Brochure") representing the period 2008 through 2012.

Generator Type	Measure	Review Period	2008-2012	Nbr of Units
		Operational Results	NERC Average	
Coal-fired Review Period	EAF	86.2%	81.6%	458
	NCF	39.8%	61.5%	
	EFOR	3.4%	8.4%	
Coal-fired Sillitimer Peak	EAF	95.5%	n/a	n/a
Total CC Average	EAF	92.5 %	85.6%	301
	NCF	67.1%	45.2%	
	EFOR	0.7%	6.39%	
Total CT Average	EAF	90.9%	62.8%	939
	SR	98.2%	97.6%	
Hydro	EAF	94.8%	84.6%	1103

<sup>4</sup> Derated hours are hours the unit operation was less than full capacity.



1           The NERC performance metrics and number of units shown in the chart for  
2           the coal-fired units represent an average of comparable units based on capacity  
3           rating.

4   **Q.   PLEASE DISCUSS SIGNIFICANT OUTAGES OCCURRING AT DEP'S**  
5   **FOSSIL/HYDRO FACILITIES DURING THE REVIEW PERIOD.**

6   **A.   In general, planned maintenance outages for all fossil and hydro units are scheduled**  
7           for the spring and fall to maximize unit availability during periods of peak demand.  
8           Most of these units had at least one small planned outage during this review period  
9           to inspect and maintain plant equipment. For the review period, the most significant  
10          outages occurred in the spring of 2013. Mayo Unit I entered a planned maintenance  
11          outage to implement several major projects during which the more significant  
12          projects completed included a dry bottom ash conversion, the replacement of 40 coal  
13          pipe burners with new low NO<sub>x</sub> burners, the replacement of discharge electrodes on  
14          the electrostatic precipitator ("ESP") for improved performance, and the conversion  
15          of the air heater baskets to a newer design, which is more resistant to plugging.

16               Also in the spring, Asheville Unit I entered a planned maintenance outage  
17               which involved major inspections on the turbine, generator, and balance of plant  
18               systems along with maintenance on the boiler. The more significant projects  
19               completed were rewind of the generator stator and field, replacement of the  
20               economizer section of the boiler, and air heater basket replacement. Roxboro station  
21               had planned maintenance outages on Unit 3 in the spring and Unit 4 in the fall. The  
22               Roxboro Unit 3 outage included maintenance work for the boiler, turbine, and  
23               scrubber. The more significant projects completed were replacement of condenser

1 tubes, replacement of SCR catalyst for enhanced NO<sub>x</sub> control, and hot reheat elbow  
2 replacements. The fall Roxboro Unit 4 outage was a planned turbine and scrubber  
3 maintenance outage. The more significant projects completed were rebundling of  
4 the condenser tubes, restoration of the turbine valves, and repairs to the ESP.

5 Significant outages for the CT fleet included returning Darlington Unit 12 to  
6 service in June 2013 following a complete restoration effort. The Company took the  
7 opportunity to incorporate upgrades including improved blade path thermocouples  
8 and generator controls, modified exhaust bearing tunnels, and installed new  
9 instrumentation to provide improved information and control for operators. A  
10 planned spring outage for a major turbine overhaul at Darlington Unit 13 required an  
11 extension due to the need to address rotor damage which occurred during installation  
12 transfer. The vendor completed a full examination and made needed repairs.

13 There were also planned outages for turbine inspections at Richmond CC  
14 and Lee CC facilities, which included maintenance activities to ensure reliability of  
15 the power blocks. Within the hydro fleet, DEP addressed end of life concerns with  
16 generator rewinds for Blewett Units 2 and 5, and Tillery Units 2 and 3.

17 **Q. HOW DOES DEP ENSURE EMISSIONS REDUCTIONS FOR**  
18 **ENVIRONMENTAL COMPLIANCE?**

19 **A.** As noted above, DEP has installed pollution control equipment on coal-fired units,  
20 as well as new generation resources in order to meet various current federal, state,  
21 and local reduction requirements for NO<sub>x</sub> and SO<sub>2</sub> emissions. The SCR technology  
22 that DEP currently operates on the coal-fired units uses ammonia or urea for NO<sub>x</sub>  
23 removal and the scrubber technology employed uses crushed limestone for SO<sub>2</sub>

1 removal. SCR equipment is also an integral part of the design of the newer CC  
2 facilities in which aqueous ammonia (19% solution of  $\text{NH}_3$ ) is introduced for  $\text{NO}_x$   
3 removal.

4 Overall, the type and quantity of chemicals used to reduce emissions at the  
5 plants varies depending on the generation output of the unit, the chemical  
6 constituents in the fuel burned, and/or the level of emissions reduction required. The  
7 Company is managing the impacts, favorable or unfavorable, as a result of changes  
8 to the fuel mix and/or changes in coal burn due to competing fuels and utilization of  
9 non-traditional coals. The goal is to effectively comply with emissions regulations  
10 and provide the most efficient total-cost solution for operation of the unit. The  
11 Company will continue to leverage new technologies and chemicals to meet both  
12 present and future state and federal emission requirements including the upcoming  
13 Mercury and Air Toxics Standards rule. Company witness McGee provides the cost  
14 information for DEP's chemical use and forecast.

15 **Q. DOES THAT CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

16 **A. Yes, it does.**